UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

DOMINION CITRUS, LTD.,

et al., : CIVIL ACTION : 1:07-cv-00050-JJF

Plaintiffs

M/V BADRINATH, her engines, machinery, tackle, apparel, etc., et al.,

V.

Defendants

NOTICE OF MOTION

Please take Notice that on June 6, 2008 at 2:00pm, or as soon thereafter as counsel may be heard, that Defendant Ashwater Navigation Co., Ltd., shall move the United States District Court for the District of Delaware, the Honorable Joseph J. Farnan, Jr., for an Order compelling Plaintiffs' response to Defendant's Interrogatories.

PALMER BIEZUP & HENDERSON LLP

By: /s/ Michael B. McCauley
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Ashwater Navigation Co., Ltd. and M/V BADRINATH

OF COUNSEL:

Frank P. DeGiulio PALMER BIEZUP & HENDERSON LLP 620 Chestnut Street, 956 Public Ledger Building Philadelphia, PA 19106 (215) 625-9900

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that service of a true and correct copy of the foregoing Notice of Motion was made to the below-listed counsel via United States First-Class Mail, postage prepaid, as follows:

Lee C. Goldstein, Esquire 615 W. 18th Street P.O. Box 1957 Wilmington, DE 19802

Stephen J. Galati, Esquire Mattioni, Ltd. 399 Market Street, Second Floor Philadelphia, PA 19106

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on May 1, 2008.

PALMER BIEZUP & HENDERSON LLP

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